

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TERRELL JONES,	)	
	)	
Plaintiff,	)	08 C 0461
	)	
vs.	)	Honorable Judge
	)	William T. Hart
CARLOS ALTEZ,	)	
SALVADOR GODINEZ	)	
	)	
Defendants.	)	

**ANSWER BY SALVADOR GODINEZ AND CARLOS ALTEZ TO PLAINTIFF'S  
COMPLAINT**

NOW COME Defendant Executive Director Salvador Godinez and Defendant Carlos Altez by their attorney RICHARD A. DEVINE, State's Attorney of Cook County, through Romano D. DiBenedetto, Assistant State's Attorney, and answer Plaintiff's Complaint as follows:

1. On September 18, 2007 I Terrell Jones was taken by correctional officers to the dispensary for a medical sick call here at the Cook County Jail Division 11 Facility taken to be seen by Dr. Carlos Altez.

ANSWER: Carlos Altez denies the averments in this paragraph.

Salvador Godinez denies the averments in this paragraph.

2. During the visit I was explaining my problems of pimples on my face and boils about my body. He started saying, "Oh you have pretty skin, and who you're trying to look good for, Do you have a boyfriend, I know you do, who is it your cell, and you can tell me I won't tell anybody." At first I thought he was joking so I smiled it off and still tried to explain my problems but he pressed on.

ANSWER: Carlos Altez denies the averments in this paragraph.

Salvador Godinez denies the averments in this paragraph.

3. In between the unprofessional and derange comments, I told him, "I'm, not gay nor I don't go that way." When I tried to explain my skin allergic reactions, His whole demeanor changed and he became rude stating this meeting is over get out of my office. He never once asked me about any medical health issues or to show him or where was my boil at.

ANSWER: Carlos Altez denies the averments in this paragraph.

Salvador Godinez denies the averments in this paragraph.

4. I stated your refusing to listen or help me is refusing medical attention he then walked out by the Nurses station and said I want him out of here, he was yelling at me to get out causing a spectacle and disturbance.

ANSWER: Carlos Altez denies the averments in this paragraph.

Salvador Godinez denies the averments in this paragraph.

5. I was asked what happened and I said, "Cause I won't go along with his homosexual comments he's refusing to answer any other of my medical inquires all of which I told the Nurse about prior and on my medical slip.

ANSWER: Carlos Altez denies the averments in this paragraph.

Salvador Godinez denies the averments in this paragraph.

6. He close the door in my face after the next patient came in he called named Jabari Stewart ID# 2007 006 4640 and inmate Larry Martin ID # 2006 0075301 also witnessed this along with the Nurses and a Co. Ms. Furgeson and other inmates who were waiting. He never denied making this comments.

ANSWER: Carlos Altez denies the averments in this paragraph.

Salvador Godinez denies the averments in this paragraph.

7. I wasn't showing any signs of me being gay so I felt offensive behind this comments, and T.J. disrespected as a man. I asked for his name but his colleagues stated they didn't know his name. So I obtained it later and filed a grievance with the social worker.

ANSWER: Carlos Altez denies the averments in this paragraph.

Salvador Godinez denies the averments in this paragraph.

8. It took me four tries because three other times I tried to send it to her she kept stating she didn't receive anything on just my request slip. So on November 16, 2007 I gave it to her in her hands.

ANSWER: Carlos Altez denies the averments in this paragraph.

Salvador Godinez denies the averments in this paragraph.

9. It was referred to medical services and to this date I never heard from them since. No questions or interviews have been made. The form number is 2007X2304.

ANSWER: Carlos Altez denies the averments in this paragraph.

Salvador Godinez denies the averments in this paragraph.

WHEREFORE, based upon the foregoing, Defendant Executive Director Salvador Godinez and Defendant Carlos Altez, in their individual and official capacities, respectfully request that this Honorable Court grant judgment in Defendants' favor and against Plaintiff on all aspects of his Complaint. Defendants further request that this Honorable Court grant them fees, costs, and such other relief that this Court deems just and appropriate.

**AFFIRMATIVE DEFENSE #1**

NOW COME Defendant Executive Director Salvador Godinez and Defendant Carlos Altez by their attorney RICHARD A. DEVINE, State's Attorney of Cook County, through

Romano D. DiBenedetto, Assistant State's Attorney, and plead the following affirmative defense:

1. Plaintiff, while an inmate, failed to exhaust his administrative remedies before filing this action. Therefore, this action should be dismissed pursuant to the Prison Litigation Reform Act, 42 U.S.C. § 1997e(a).

WHEREFORE, based upon the foregoing, Defendant Executive Director Salvador Godinez and Defendant Carlos Altez, in their individual and official capacities, respectfully request that this Honorable Court grant judgment in Defendants' favor and against Plaintiff on all aspects of his Complaint. Defendants further request that this Honorable Court grant them fees, costs, and such other relief that this Court deems just and appropriate.

**JURY DEMAND**

Defendants demand a trial by jury.

Respectfully submitted,

RICHARD A. DEVINE  
State's Attorney of Cook County

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